

**IN THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT
OF TEXAS SHERMAN DIVISION**

EDWARD BUTOWSKY, in his
personal and professional capacities,

Plaintiff,

v.

MICHAEL ISIKOFF, ELLEN
RATNER, and VERIZON
COMMUNICATIONS, INC.,

Defendants.

Case No. 4:20-cv-00542-ALM

JURY DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS
VERIZON COMMUNICATIONS, INC. AND MICHAEL ISIKOFF TO ANSWER,
MOVE, OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Defendants Verizon Communications, Inc. and Michael Isikoff (collectively, “Defendants”) respectfully move the Court to extend the time for Defendants to answer, move, or otherwise respond to Plaintiff’s Complaint, up to and including October 30, 2020. Defendants previously requested and were granted an extension of up to and including October 9, 2020, from the original response date of August 12, 2020. (Dkt. No. 5). Plaintiff filed his Complaint on July 14, 2020.

Defendants seek this further extension to more fully evaluate the parties’ claims and defenses, and not for purposes of delay. Plaintiff does not oppose Defendants’ extension request. The parties agree that, by entering into this agreement, Defendants will not waive any defenses including, but not limited to, the defenses contained within Fed. R. Civ. P. 12(b).

Accordingly, Defendants respectfully request that the Court extend Defendants' time to answer, move, or otherwise respond to Plaintiff's Complaint up to and including October 30, 2020. A proposed order is attached.

Dated: September 30, 2020

/s/ Ty Clevenger

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Counsel for Defendants Verizon Communications, Inc. and Michael Isikoff

CERTIFICATE OF CONFERENCE

This is to certify that on September 29, 2020, counsel for Defendants and Plaintiff conferred by phone and email regarding the relief requested in this motion. Counsel for Defendants confirmed that Plaintiff does not oppose this motion.

/s/ Jean-Paul Jassy
Jean-Paul Jassy

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing on September 30, 2020, via the Court's CM/ECF system.

/s/ Ty Clevenger
Ty Clevenger